

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	04-043275
PROSECUTOR NO. :	095352207
OCN :	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DANIEL A. MERIDY)	
)	CASE NO. 0716-CR00447
LA -)	DIVISION
DOB: 03/21/1984)	
Race/Sex: B/M)	
████████████████████)	
)	DEFENDANT.

INFORMATION IN LIEU OF INDICTMENT

In the Circuit Court of Jackson County, Missouri, at , Term, 2019. In Division Number ____ thereof, designated by the rules of said Court as Criminal Division____.

**Count I. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing -
1st Degree (565.110-002Y195010040)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **class B felony of kidnapping in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 14, 2004, in the County of Jackson, State of Missouri, defendant unlawfully removed █████ from 38th & Troost, Kansas City, Missouri, the place where █████ was found by defendant, without █████s consent for the purpose of facilitating the commission of a felony; to wit: Forcible Rape.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 14, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Kidnapping charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Kidnapping by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. Attempt Forcible Rape - Attempt Sexual Intercourse By Forcible Compulsion (566.030-994Y200211010)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the felony of attempted forcible rape, punishable upon conviction under Section 566.030, RSMo, in that on or about May 14, 2004, in the County of Jackson, State of Missouri, the defendant tried to place his penis in ■■■'s vagina, and such conduct was a substantial step toward the commission of the crime of forcible rape of ■■■ and was done for the purpose of committing such forcible rape.

The range of punishment for the unclassified felony of attempted forcible rape is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years.

Count IV. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 14, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Attempted Forcible Rape charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Forcible Rape by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any

punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count V. Forcible Rape (11008990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the felony of forcible rape, punishable upon conviction under Section 566.030, RSMo, in that on or about May 14, 2004, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] by the use of forcible compulsion.

The range of punishment for the unclassified felony of forcible rape is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years.

Count VI. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 14, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Forcible Rape charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Forcible Rape by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended

imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count VII. Kidnap-facil Fel/injury/terror (16020990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping, punishable upon conviction under Section 558.011, RSMo, in that on or about May 20, 2004, in the county of Jackson, State of Missouri, the defendant unlawfully removed [REDACTED] without her consent from Armour & Troost, the place where she was found by the defendant, for the purpose of facilitating the commission of a felony, to wit: Forcible Rape.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count VIII. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 20, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Kidnapping charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Kidnapping by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the

Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count IX. Forcible Sodomy (11084990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of forcible sodomy, punishable upon conviction under Section 566.060, RSMo, in that on or about May 20, 2004, in the County of Jackson, State of Missouri, the defendant knowingly had deviate sexual intercourse with ■ by the use of forcible compulsion, to wit: the defendant placed his penis in ■s mouth, and in the course of such offense, the defendant displaced a dangerous instrument in a threatening manner.

The range of punishment for the unclassified felony of forcible sodomy is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years.

Count X. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 20, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Forcible Sodomy charged in Count IX, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Forcible Sodomy by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended

imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count XI. Forcible Rape (11008020)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the felony of forcible rape, punishable upon conviction under Section 566.030, RSMo, in that on or about May 20, 2004, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with ■■■■■ by the use of forcible compulsion.

Count XII. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 20, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Forcible Rape charged in Count XI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Forcible Rape by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the

Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count XIII. Kidnap-facil Fel/injury/terror (16020990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping, punishable upon conviction under Section 558.011, RSMo, in that on or about May 11, 2004, in the county of Jackson, State of Missouri, the defendant unlawfully removed [REDACTED] without her consent from 39 [REDACTED] Flora, the place where she was found by the defendant, for the purpose of facilitating the commission of a felony, to wit: Forcible Rape.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count XIV. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 11, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Kidnapping charged in Count XIII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Kidnapping by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The

range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count XV. Sex Abuse (22021990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.100, RSMo, committed the class B felony of sexual abuse punishable upon conviction under Section 558.011, RSMo, in that on or about May 11, 2004, in the County of Jackson, State of Missouri, the defendant knowingly subjected ■ to sexual contact by the use of forcible compulsion, to wit: defendant placed his hand on ■'s breast, and in the course of such offense, the defendant displaced a deadly weapon in a threatening manner.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years. The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

Count XVI. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 11, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Sexual Abuse charged in Count XV, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Sexual Abuse by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count XVII. Forcible Rape (11008990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the felony of forcible rape, punishable upon conviction under Section 566.030, RSMo, in that on or about May 11, 2004, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] by the use of forcible compulsion.

The range of punishment for the unclassified felony of forcible rape is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years.

Count XVIII. Armed Criminal Action (31010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about May 11, 2004, in the county of Jackson, State of Missouri, the defendant committed the felony of Forcible Rape charged in Count XVII, all allegations of which are incorporated

herein by reference, and the defendant committed the foregoing felony of Forcible Rape by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jill Icenhower
Jill Icenhower (#44197)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3379
jicenhower@jacksongov.org

WITNESSES:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. SGT Todd R. Templeton, 1125 Locust, Kansas City, MO 64106

